

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
STATESVILLE DIVISION**

IN RE

LINDA HAMPTON PERRY

SSN: xxx-xx-7840

Debtor.

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)

)

Chapter 13

Case No. 16-50563

MOTION TO SUBSTITUTE COUNSEL

NOW COME Robert H. Gourley, Jr. and the Debtor, and request that Robert H. Gourley, Jr. be substituted as counsel of record in this matter. In support of this request, Counsel and the Debtor show the Court the following:

1. The Debtor filed a Chapter 13 petition on September 12, 2016.
2. Danielle J. Walle is reflected as Counsel of record in the Chapter 13 petition.
3. Robert H. Gourley, Jr. requests a \$500.00 attorney fee and costs of \$35.00 in connection with this Motion, which fee and costs to be paid through the plan.

WHEREFORE, Robert H. Gourley, Jr. and the Debtor respectfully request that Robert H. Gourley, Jr. be substituted as Counsel of Record for the Debtor effective immediately. Robert H. Gourley, Jr., requests a \$500.00 attorney fee and costs of \$35.00 in connection with this Motion, which fee and costs to be paid through the plan.

Respectfully submitted this 16th day of January, 2018.

Law Offices of Robert H. Gourley, Jr.

____s/Robert H. Gourley, Jr.____
Robert H. Gourley, Jr., NC Bar #: 19034
249 East Broad Street
Statesville, NC 28677
Telephone: (704) 872-5051
Facsimile: (704) 872-5449

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a copy of the foregoing MOTION TO SUBSTITUTE COUNSEL AND NOTICE OF OPPORTUNITY FOR HEARING was served by depositing a true and exact copy in an official repository of the United States Mail on the following:

Trustee

Creditor Matrix

This the 16th day of January, 2015.

____s/Janet Pekarek____
Janet Pekarek

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
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IN RE

LINDA HAMPTON PERRY

SSN: xxx-xx-7840

Debtor.

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Chapter 13

Case No. 16-50563

**NOTICE OF MOTION TO SUBSTITUTE COUNSEL
(Response required if opposed and hearing sought)**

TAKE NOTICE that Counsel for Debtor has filed papers with the Court to substitute counsel. **YOUR RIGHTS MAY BE AFFECTED**. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you do not want the Court to allow the substitution of counsel, or if you want the Court to consider your views on the motion, then on or before January 30, 2018, you or your attorney must:

- 1) File with the Court a written response (an answer explaining your position) at:
Office of the Bankruptcy Clerk
United States Bankruptcy Court
401 W. Trade Street
Charlotte, NC 28202

If you mail your response to the Court for filing, you must mail it early enough so that the Court will **receive** it on or before the date stated above.

- 2) You must also mail a copy to:
Robert H. Gourley, Jr. Trustee
Attorney for the Debtor
249 E Broad Street
Statesville, NC 28677

- 3) If you file a response as set forth above, then a hearing will be held on: **February 9, 2018 at 9:30 a.m. at the US Bankruptcy Court, 200 W Broad Street, Statesville, NC.**

NO HEARING WILL BE HELD UNLESS A RESPONSE IS FILED.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Respectfully submitted this 16th day of January, 2018.

Law Offices of Robert H. Gourley, Jr., P.A.

____s/Robert H. Gourley, Jr.____
Robert H. Gourley, Jr., NC Bar #: 19034
249 East Broad Street
Statesville, NC 28677
Telephone: (704) 872-5051
Facsimile: (704) 872-5449

Label Matrix for local noticing
0419-5
Case 16-50563
Western District of North Carolina
Statesville
Tue Jan 16 11:39:51 EST 2018

United States District Court
Federal Courthouse Rm. 233
100 Otis Street
Asheville, NC 28801-2608

Statesville Division
200 West Broad Street
Room 100 1st Floor
Statesville, NC 28677-5258

AT&T
Attn. Corporate Officer
PO Box 5093
Carol Stream, IL 60197-5093

Arizona Department of Economic Security
Office of Account Receivables
PO Box 504097
Saint Louis, MO 63150-4097

Arizona Department of Economic Security
PO Box 60
Phoenix AZ 85001-0060

Assistant U.S. Attorney Gil Beck
United States Courthouse
100 Otis Street, Room 233
Asheville, NC 28801-2688

Attorney General Loretta Lynch
U.S. Department of Justice
950 Pennsylvania Ave., NW
Washington, DC 20530-0001

Chase Home Mortgage Customer Service
Attn. Corporate Officer
PO Box 24696
Columbus, OH 43224-0696

Chase Records Center
Attn: Correspondence Mail
Mail Code LA4-5555
700 Kansas Lan
Monroe LA 71203-4774

Chase Records Center/Correspondence Mail
Attn: Corp Officer
Mail Code LA4-5555
700 Kansas Lane
Monroe, LA 71203-4774

Chex Systems, Inc.
Attn: Consumer Relations
7805 Hudson Road
Suite 100
Saint Paul, MN 55125-1703

Ct. of Common Pleas of Philadelphia Co.
Philadelphia Courts of Common Pleas
ATTN: Case #160100663
Philadelphia, PA 19107

Franklin Collection Services
Attn: Corp Officer
2978 W. Jackson St.
Tupelo, MS 38801-6731

Homeward Residential
Attn: Corp Officer
1525 S. Belt Line Road
Coppell, TX 75019-4913

IREDELL COUNTY TAX COLLECTOR
P O BOX 1027
STATESVILLE, NC 28687-1027

(p)INTERNAL REVENUE SERVICE
CENTRALIZED INSOLVENCY OPERATIONS
PO BOX 7346
PHILADELPHIA PA 19101-7346

IRS
Central Insolvency Operation
PO Box 7346
Philadelphia, PA 19101-7346

Internal Revenue Service
P.O. Box 7317
Philadelphia, PA 19101-7317

Iredell County Tax Collector
Attn: Corporate Officer
P.O. Box 1027
Statesville, NC 28687-1027

JP Morgan Chase Bank, N.A.
Attn: Corp Officer
3415 Vision Drive
Columbus, OH 43219-6009

JPMC Specialty Mortgage LLC F/K/A WM Spe
ATTN: Corporate Officer
3415 Vision Dr.
Columbus, OH 43219-6009

KML Law Group
Attn: Corp Officer
701 Market Street Suite 500
Philadelphia, PA 19106-1538

KML Law Group
Attn: Nora C. Viggiano
701 Market Street Suite 500
Philadelphia, PA 19106-1538

NC Dept of Revenue
Central Collection Unit
PO Box 1168
Raleigh, NC 27602-1168

Navient
Attn: Corp Officer
PO Box 9635
Wilkes Barre, PA 18773-9635

Navient Solutions, Inc. on behalf of TGS LC
P.O. Box 83100
Round Rock, TX 78683-3100

North Carolina Department of Revenue
Bankruptcy Unit
P.O. Box 1168
Raleigh, NC 27602-1168

Pennsylvania Court of Common Pleas
Philedelphia City Hall
Chestnut Street
Philadelphia, PA 19107

Pennsylvania Dept of Revenue
Attn: Corp Officer
Strawberry Square
Harrisburg, PA 17128-0001

Pennsylvania Housing Finance Agency
Attn: Corp Officer
PO Box 8029
Harrisburg, PA 17105-8029

SLMA Securities Corporation
Attn: Corp Officer
PO Box 9500
Wilkes Barre, PA 18773-9500

Time Warner Cable
Attn: Corp Officer
3140 W. Arrowood Road
Charlotte, NC 28273-0001

Danielle J. Walle
McIlveen Family Law
174 S. South Street
Gastonia, NC 28052-4125

Linda Hampton Perry
2414 Abernathy Ave
Statesville, NC 28625-6403

Steven G. Tate
212 Cooper Street
Statesville, NC 28677-5856

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

IRS
4405 Bland Rd
Raleigh, NC 27609

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)JPMC Specialty Mortgage LLC f/k/a WM Speci

End of Label Matrix	
Mailable recipients	35
Bypassed recipients	1
Total	36